

ACCELECOM GA, LLC

ROBOCALL MITIGATION PLAN

As part of its Robocall Mitigation Database filing required under the FCC’s *Call Authentication Trust Anchor, Sixth Report and Order and Further Notice of Proposed Rulemaking* (Sixth Report and Order and Further Notice of Proposed Rulemaking, FCC 23-18 (March 17, 2023)) This document describes Accelecom GA’s certifications and robocall mitigation plan to detect and prevent unlawful robocalls from originating on its network.

Alianza, Inc. (Alianza – RMD0006320) is Accelecom GA’s sole underlying voice services provider. Accelecom GA does not own or operate any voice switching equipment, lacks control over the network infrastructure necessary to implement STIR/SHAKEN, and is therefore exempt from implementation obligations.

Accordingly, Accelecom GA relies on the procedures, policies, and safeguards implemented by Alianza to ensure that Accelecom GA and business customers are sufficiently protected against robocall and spoofing activities. On behalf of Accelecom GA, Alianza authenticates voice traffic using STIR/SHAKEN.

Accelecom GA has a 499 Filer ID number of 835518 and also a Federal Registration Number (“FRN”) of 0032516692.

1. ACCELECOM GA, LLC’s CORPORATE INFORMATION

Accelecom GA, LLC (“Accelecom GA” “the Company”) is a Delaware corporation. Its primary address is provided within the Robocall Mitigation Database.

Accelecom GA certifies it has not been prohibited from filing in the Robocall Mitigation Database and has not been subject to any Commission, law enforcement, or regulatory agency action or investigation arising from suspected unlawful robocalling or spoofing.

In accordance with 47 CFR § 64.6305(e), Accelecom GA has designated a point of contact to receive notice of any illegal robocall traffic or other robocall mitigation-related issues. That person's name, title, address, phone number, and email address are available within the Robocall Mitigation Database.

The Company has an affiliated entity based on Kentucky and that entity, OpenFiber Kentucky Company (“OFKY”) sole business model is concentrated on Dark Fiber, the Company’s dark fiber ring in KY and providing fiber strands for long term lease to business customers who will then provide their own services and light the dark fiber which the Company providers. The FRN for the Company is 0030151302 and the 499 Filer ID number 834026. This entity is not a voice provider and does not offer voice services to business customers. The business of the affiliated entity is Dark Fiber only.

2. **KNOW YOUR CUSTOMER and SUBSCRIBER VETTING**

Accelecom GA takes reasonable steps to verify the identity of its voice service subscribers and to prevent the origination of illegal robocalls on its network.

i. **Customer Identity Verification.**

During service activation, Accelecom GA collects and verifies basic subscriber information, including name, service address, and contact details. Business customers are also required to provide the business name and a primary point of contact.

ii. **Prohibited Use.**

All subscribers are bound by Accelecom GA's Terms of Service, which explicitly prohibit the use of voice services for illegal robocalls or other abusive calling practices such as autodialing, spoofing, or telemarketing without consent.

The Company has in place an Acceptable Use Policy ("AUP") that is very specific and states, without limitation that; business customers are able to use the Voice Services but reselling of any service is prohibited, any customer calls that may be suspected of being and/or are illegal robocalls can be immediately halted, or suspended by the Company and/or the Company had the right to terminate the business customers service and use thereof.

The Company's AUP grants all rights and privileges to the Company whereby the Company can control the service it resells and how the service is used by a business customer. Again, if the Company has information or belief that the services are being used in a nefarious way it has the right (though it's underlying Carrier Alianza) to halt, suspend or cease providing services to the customer.

iii. **Risk Assessment, Monitoring and Enforcement.**

All outbound call traffic is monitored for patterns consistent with illegal robocall activity. When such activity is detected, Accelecom GA may investigate and, if appropriate, suspend or terminate service.

1. The company has third party tools and analytics which is supplied to it by Alianza. These tools can also monitor and track Call Detail Records ("CDR's"). The CDR information can be used at any time to help identify the potential of illegal robocalls.
2. The CDR's can be analyzed and summarized to immediately flag traffic that has the characteristics of illegal robocall traffic. This monitoring includes High Volume, Short Duration ("HVSD"), sequential dialing patterns, calls to NPA-NXXs to help identify and also combat identifying illegal robocalls.
3. As mentioned above, the Company utilizes a combination of tools provided by its underlying carriers and platform providers along with third-party solutions to check for Do Not Originate (DNO) numbers. In addition, the

Company utilizes a combination of internal tools and third-party solutions to detect invalid phone number formats, area codes and unassigned number blocks. The Company also utilizes data analytics to detect and investigate irregular and unexpected calling patterns, originating number use against customer profiles.

Accelecom GA's robocall mitigation practices are designed to comply with the requirements of 47 C.F.R. § 64.1200(n)(4) and are reviewed and updated as needed to address emerging risks.

3. KNOW YOUR UPSTREAM PROVIDER PROCEDURES

Alianza has existing agreements with Tier-I carrier service providers from which it facilitates the provision of carrier services to its service provider customers. Alianza has confirmed that each of those carriers are listed in the RMD. Alianza also enables its customers to contract directly with carrier service providers to enable those customers' use of Alianza's Cloud Communications Platform. In each case, Alianza has provided detailed onboarding and fraud detection guidance to require and enable its customers to comply with their obligations to prevent and mitigate illegal robocalling.

4. FRAUD DETECTION AND MITIGATION

Alianza has implemented a proprietary fraud detection and mitigation process through which it analyzes high-volume network traffic to evaluate compliance with a variety of fraud detection indicators and fraud prevention best practices. Through this fraud detection and mitigation process, Alianza then notifies individual customers of potentially fraudulent activity occurring in any of that customer's subscriber accounts. Detailed information about this fraud detection and mitigation process is provided to each customer through Alianza's knowledge base and support resources. Alianza may take remedial action against any subscriber's account to prevent or remediate robocalling or other fraudulent activity. If Alianza takes any such action, its fraud detection system triggers notification to the customer of that action and any remedial steps that may be taken to restore service.

5. ENFORCEMENT

Accelecom GA and Alianza respond within 24 hours to all traceback requests from the FCC, law enforcement, and the Industry Traceback Group (“ITG”). Accelecom GA and Alianza also cooperate with those entities and with its carrier partners to investigate and prevent any illegal robocalls from using Alianza's services to originate calls. Alianza employees engage directly with Alianza's customers to suspend or disable subscriber accounts identified as originating unlawful robocalls through Alianza's network.